EXHIBIT 1

From: Park, Ryuk

Sent: Thursday, March 9, 2023 11:33 AM

To: Zhao, Yanan; Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com

Cc: #Netlist-Micron [Int]; Jennifer Truelove (jtruelove@McKoolSmith.com); Henderson, Drew

Subject: RE: Supplemental Infringement Contentions | Netlist v. Micron, 22-cv-203-JRG (E.D. Tex.)

Yanan,

Based on our review of Netlist's responses to Micron's Interrogatory No. 1, Micron is unable to agree to Netlist's proposed amended infringement contentions. If Netlist wishes to meet and confer, please propose a time and date next week and be prepared to discuss why Netlist did not provide the documents and disclosures earlier, e.g., in November 2022.

Thanks and regards,

Ryuk Park

Of Counsel

Winston & Strawn LLP T: +1 650-858-6500 D: +1 650-858-6440

M: +1 607-242-9789 F: +1 650-858-6550

winston.com



From: Park, Ryuk <RPark@winston.com>
Sent: Wednesday, February 15, 2023 2:29 PM

To: Zhao, Yanan <yzhao@irell.com>; Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com

Cc: #Netlist-Micron [Int] <Netlist-Micron@irell.com>; Jennifer Truelove (jtruelove@McKoolSmith.com)

<jtruelove@McKoolSmith.com>; Henderson, Drew <dhenderson@irell.com>

Subject: RE: Supplemental Infringement Contentions | Netlist v. Micron, 22-cv-203-JRG (E.D. Tex.)

Yanan,

Thanks. Just to be clear, is Netlist seeking to assert invention dates that are earlier than dates Netlist previously identified in its Infringement Contentions? If so, is Netlist able to share what the dates are for each asserted patent?

Best,

Ryuk

From: Zhao, Yanan < yzhao@irell.com>

Sent: Wednesday, February 8, 2023 10:31 AM

To: Park, Ryuk < RPark@winston.com >; Winston-Micron-Netlist < Winston-Micron-Netlist@winston.com >; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com

Case 2:22-cv-00203-JRG-RSP Document 61-1 Filed 04/24/23 Page 3 of 3 PageID #: 2485

Cc: #Netlist-Micron [Int] < Netlist-Micron@irell.com >; Jennifer Truelove (jtruelove@McKoolSmith.com) < jtruelove@McKoolSmith.com >; Henderson, Drew < dhenderson@irell.com >

Subject: RE: Supplemental Infringement Contentions | Netlist v. Micron, 22-cv-203-JRG (E.D. Tex.)

Hi Ryuk,

Netlist's supplemental disclosures under 3-1/3-2 are about the conception and reduction to practice of Netlist's patents, which are different and do not affect Netlist's claimed priority dates.

We believe these same documents have been produced in the Samsung case.

Thanks, Yanan

From: Park, Ryuk < RPark, Ryuk < a href="mailto:RPark, Ryuk < a h

To: Zhao, Yanan <<u>yzhao@irell.com</u>>; Winston-Micron-Netlist <<u>Winston-Micron-Netlist@winston.com</u>>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com

Cc: #Netlist-Micron [Int] <Netlist-Micron@irell.com>; Jennifer Truelove (jtruelove@McKoolSmith.com)

<jtruelove@McKoolSmith.com>; Henderson, Drew <dhenderson@irell.com>

Subject: RE: Supplemental Infringement Contentions | Netlist v. Micron, 22-cv-203-JRG (E.D. Tex.)

Yanan,

We need additional information to assess your request. Is Netlist seeking to change its priority allegations to an earlier date? And if so, for what claims and to what date? Additionally, are the documents listed on pp. 12-18 of Netlist's proposed amended contention the same documents that Netlist produced in the case *Netlist v. Samsung*, 21-cv-463-JRG (EDTX) in or before November of last year?

Thanks and regards,

Ryuk

Ryuk Park

Of Counsel

Winston & Strawn LLP 255 Shoreline Drive, Suite 520 Redwood City, CA 94065

D: +1 650-858-6440 M: +1 607-242-9789 F: +1 650-858-6550

VCard | Email | winston.com



From: Zhao, Yanan <<u>vzhao@irell.com</u>>
Sent: Friday, February 3, 2023 11:42 AM

To: Winston-Micron-Netlist < Winston-Micron-Netlist@winston.com >; andrea@wsfirm.com; ce@wsfirm.com;

wh@wsfirm.com